## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA, ex rel. ANTONI MUHAWI,	) ) )
Plaintiff,	)
v.	) Case No. 18-cv-02022
PANGEA EQUITY PARTNERS, et al.,	) Hon. Manish S. Shah  Magistrata Judga Mary M. Baydand
Defendants.	) Magistrate Judge Mary M. Rowland )

## PANGEA DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate, and Pangea Real Estate Holdings, LLC (collectively, "the Pangea Defendants"), move for summary judgment pursuant to Federal Rule of Civil Procedure 56(c), and in support submit their accompanying Memorandum of Law, Statement of Material Facts, Declaration of Krusha Evans, Declaration of Patrick Borchard, and supporting exhibits.

WHEREFORE, the Pangea Defendants respectfully request that the Court grant their motion and grant such further relief as the Court deems just and proper.

Dated: January 27, 2022 Respectfully submitted,

Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate, and Pangea Real Estate Holdings, LLC

By: <u>/s/ Brian Hayes</u>
One of Their Attorneys

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